

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : NO. 3:18-CR-97  
:  
v. : (Mariani, J.)  
:  
ROSS ROGGIO, : (electronically filed)  
Defendant :  
:

**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME  
TO RESPOND TO DEFENDANT'S PRETRIAL MOTION**

AND NOW, the United States of America, by its undersigned counsel, submits the following Motion for Enlargement of Time to File its response to Defendant's Pretrial Motion. In support of this motion the United States alleges as follows:

1. On October 11, 2019, Gino Bartolai, counsel for defendant Ross Roggio, filed a suppression motion (Doc. 65). The United States' response to that motion was due on or before June 29, 2020. Counsel for the government apologizes to the Court for missing the deadline.
2. Counsel for the government was subject to significant time constraints arising from other briefing deadlines and tele-working constraints due to COVID-19 that prevented preparation and filing of a brief on or before June 29, 2020.
3. The undersigned respectfully requests a thirty (30) extension

of time, or until **July 29, 2020**, to respond to the pretrial motion.

4. Based upon the above, it is respectfully submitted that the ends of justice will be served by the extension and excluding from the Speedy Trial clock a period of thirty (30) from the date of the attached Order. The parties concede that the adjournment for the stated reason outweighs the interest of the public and the defendant in a speedy trial.

5. Counsel for the defendant, Gino A. Bartolai, Esq. concurs in this motion.

Respectfully submitted,

/s/ Todd K. Hinkley

TODD K. HINKLEY

Assistant United States Attorney  
235 N. Washington Ave., Suite 311  
Scranton, PA 18503  
(570) 348-2800 (telephone)

Dated: July 6, 2020

**CERTIFICATE OF CONCURRENCE**

I, Todd K. Hinkley, Assistant United States Attorney, have contacted Gino Bartolai, Esquire, counsel for defendant Ross Roggio, who concurs in the filing of this motion.

/s/ Todd K. Hinkley

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TODD K. HINKLEY  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 6<sup>th</sup> day of July, 2020, I caused the foregoing Motion to be filed and that attorney Gino Bartolai, Esquire, is a filing user under the ECF system. Upon the electronic filing of a pleading or other document, the ECF system will automatically generate and send a Notice of Electronic Filing to all filing users associated with this case. Electronic service by the Court of the Notice of Electronic Filing constitutes service of the filed document and no additional service upon the filing user is required.

/s/ Katherine Sanchez  
KATHERINE SANCHEZ  
Legal Assistant